



October 6, 2021

Director Ruth Friedman, Ph.D.
Office of Child Care
Administration for Children and Families
Room 4502
Mary E. Switzer Building
Washington, DC 20201

Dear Dr. Friedman,

Child Care Aware® of America (CCAoA) is a national membership-based nonprofit organization working to advance a high-quality, affordable child care system that supports children's growth, development, and early education. Founded in 1987, we advocate for child care policies that improve the lives of children and families, lead research that advances the child care and early learning field, leverage technology to help families make informed decisions about child care and provide professional development for child care providers.

This past year, we worked with numerous stakeholders to support engagement in the 2022-2024 Child Care and Development Fund (CCDF) State Plan process. Public input is a critical part of developing a state plan. Not only does public input ensure decision-makers have complete information, but it can also build buy-in and legitimacy from the field. Given that state lead state agencies are required to hold at least one public hearing, with sufficient statewide or territory-wide distribution of notice, to gather stakeholder input on what policies to include, CCAoA was interested in learning more about how states ensure they comply with both the letter and the spirit of this requirement. Our review found that there is substantive opportunity for improvement to maximize the potential of the public input process moving forward.

CCAoA collected information on the public input process in the District of Columbia and every state. For more information about each state's public hearing process, view [CCAoA's public input session tracker](#). We found that:

- Virtual hearings (using platforms like Zoom and WebEx) were popular options, though some states, like Texas, also allowed for in-person participation.
- States like California, Kansas and North Carolina held pre-hearing input sessions with stakeholders or convened workgroups to gain initial feedback before releasing drafted plans.
- We observed that hearings started March 30 with California and the last hearing before the July 1 deadline was held in Indiana on June 25, 2021. Most hearings were held in May and June.
- [New Hampshire](#) did not hold its hearing until July 19 and [Alaska](#) provided an additional opportunity for input on July 27 and allowed written comments to be submitted until August 7.

In reflecting on this year's CCDF public input process, several best practices, as well as concerns, were observed that either helped or hindered participation in the process in the following areas:

- **Pre-hearing sessions:** Some states held organized, informal public input sessions around the state to gather feedback before drafting the state's plan. While this did not happen often, when it did it allowed child care stakeholders to have an additional chance to provide meaningful feedback, rather than responding to a plan already developed. Some pre-hearing sessions were organized to gather input on specific sections of the plan or were targeted to certain stakeholders.
- **Notification process:** States are required to post a public notification of the hearing at least 20 calendar days prior to the date of the hearing. States should give as much notice as possible. To cast the widest net, notification should extend beyond print in local and statewide newspapers and should be easily found on a state agency's website. Announcements on social media can help reach families and providers. States should also disseminate notice of the public hearing through stakeholder communities and should be included in communications (like listservs) with child care coalitions, child care resource and referral agencies (CCR&Rs), partner agencies, tribal associations, and state and local government personnel.
- **Scheduling:** Holding just one hearing during the day can prevent many people from engaging in the public input process, especially busy parents and working providers. Holding multiple hearings at different times— both during the day and in the evening— and with ability to translate in multiple languages can open participation for many more individuals. As an example, [West Virginia](#) held six hearings in its CCR&R regions throughout the month of May. [Washington](#) scheduled two virtual hearings in English, with Spanish and Somali interpretations. Further, states that wait until the very end of June to schedule a hearing, with plans to submit in early July, may not be able to thoroughly review public testimony.
- **Registration:** Registering for the hearing should be flexible and as easy as possible for the public to sign up. States should provide all the necessary information upfront, like access codes and passwords for virtual meetings, and allow for participants to register at any time including during the hearing itself, in the same way that individuals would be able to attend a public hearing held in-person. While requiring pre-registration multiple days in advance of the hearing or requiring registration to listen may allow state agencies to better plan an agenda, it can prevent participants from the opportunity to engage. Using commonly used platforms, like Zoom, can allow for more successful registration, as people are more familiar with the technology.
- **Availability of the draft plan:** States must note how their draft plan content was made available to the public in advance of the public hearing. A commonly observed practice was for lead state agencies to upload the draft document online ahead of the hearing and offer translation if requested. [Connecticut](#) went a step further and made available a summary document highlighting the key initiatives in each section of the plan in English and Spanish. Draft plans should also be released, at minimum, 48 hours in advance of the hearing to give child care stakeholders enough time to read through them in their entirety. Some states released a lengthy draft plan just the day before hearing, which limits the public's ability to fully understand and adequately give feedback on the state's plan.
- **Virtual hearings:** Virtual advocacy creates more access and brings people to the table that otherwise may never have participated in advocacy before. Every state had an option to participate virtually this year. States should continue the option to participate in the CCDF public input process virtually in the future, even after the pandemic subsides, to grow participation.

- **Written comment period:** Providing online portals and surveys allows individuals to easily input their recommendations and challenges into organized field boxes. While developing written testimony may be a barrier to participation for some stakeholders, surveys and other collection methods can provide an easier approach that does not require extensive knowledge of the intricacies of the state plan. States should give individuals time to submit their written testimony after the hearing has occurred, as some who testify in-person or virtually may have a more detailed written comment to submit. This past spring, some states allowed participants to submit written comments weeks after the hearing, while others closed the ability to do so on the same date as the hearing. Allowing for multiple options to email, mail and fax written comments also increases the ability to participate.

Wide participation in the CCDF public comment period allows for state officials to hear from the field and elevate provider and family experiences to inform long-term policies that can strengthen the child care system. With this in mind, it is imperative that the public input process is protected and strengthened to allow for as many families, community members and child care providers to engage as much as possible. CCAoA urges the Office of Child Care to require states to implement best practices such as these to promote successful far-reaching participation in future state planning processes.

Thank you for your consideration. We look forward to working together on this important issue.

Sincerely,

A handwritten signature in black ink that reads "Lynette M. Fraga". The signature is written in a cursive style and is positioned to the left of a vertical line.

Lynette M. Fraga, Ph.D.
Chief Executive Officer